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February 14, 2013

BY ELECTRONIC DELIVERY

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW Washington DC 20554

Re: Progeny LMS, LLC

Permitted Oral Ex Parte Presentation

WT Docket No. 11-49

Dear Ms. Dortch:

On February 12, 2013, Gary Parsons, CEO of Progeny LMS, LLC ("Progeny") and the undersigned met with Julius Knapp, Karen Ansari, and Hugh Van Tuyl of the Office of Engineering and Technology to discuss the results of test reports demonstrating Progeny's compliance with Section 90.353(d) of the Commission's rules. During the meeting, the Progeny representatives answered questions regarding the points raised in its January 11, 2013 response to comments that were filed addressing the test reports. The Progeny representatives also discussed the status of its network build out and the results of wireless location accuracy testing that was conducted by Working Group 3 of the Commission's Communications Safety Reliability and Interoperability Council.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely

Bruce A. Olcott

Counsel to Progeny LMS, LLC